

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

VOLKSWAGEN AG, VOLKSWAGEN OF
AMERICA, INC. and BUGATTI
INTERNATIONAL, S.A.

Plaintiffs and Counterclaim Defendants,

v.

THE BUGATTI, INC.

Defendant and Counterclaim Plaintiff.

Civil Action No. 05-11067-PBS

**THE BUGATTI, INC.'S ASSENTED-TO MOTION FOR LEAVE TO FILE A REPLY
MEMORANDUM IN SUPPORT OF IT'S MOTION TO COMPEL RESPONSES TO
OUTSTANDING DISCOVERY REQUESTS FROM PLAINTIFFS**

In accordance with Local Rule 7.1(B)(3), Defendant The Bugatti, Inc., ("Bugatti") requests leave to file a Reply Memorandum In Response To Plaintiffs' Opposition To The Bugatti Inc.'s Motion To Compel Responses To Outstanding Discovery Requests ("Reply Memorandum"). In support of this Motion, Bugatti states that its Reply Memorandum is necessary to address certain further (and related) improperly redacted documents produced by Plaintiffs in the time since Bugatti filed its Motion to Compel and Plaintiffs' new allegations of use under the Lanham Act of the asserted trademarks.

Counsel for Defendants has assented to this Motion.

WHEREFORE, Bugatti requests the Court grant it leave to submit the aforementioned Reply Memorandum.

Respectfully submitted,

THE BUGATTI, INC.,

By its attorneys

/s/ Geri L. Haight
H. Joseph Hameline (BBO #218710)
Geri L. Haight (BBO #638185)
Philip J. Catanzano (BBO #654873)
Darci J. Bailey (*pro hac vice*)
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(617) 542-6000

Dated: March 15, 2006

LOCAL RULE 7.1(A)(2) CERTIFICATION

Prior to filing this Motion, counsel for Defendant contacted counsel for Plaintiffs by e-mail, and counsel for Plaintiffs has assented to this Motion.

Dated: March 15, 2006

/s/ Geri L. Haight
Geri L. Haight

Certificate of Service

I hereby certify that on this day, I caused a true and accurate copy of the foregoing document to be served by hand upon Margaret H. Paget, Esq., SHERIN AND LODGEN LLP, 101 Federal Street, Boston, Massachusetts 02110

Dated: March 15, 2006

/s/ Geri L. Haight
Geri L. Haight